

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

1201 NORTH MARKET STREET
P.O. BOX 1347
WILMINGTON, DELAWARE 19899-1347
(302) 658-9200
(302) 658-3989 FAX

KENNETH J. NACHBAR
(302) 351-9294
(302) 425-3013 FAX
KNachbar@morrisnichols.com

May 19, 2021

VIA ELECTRONIC FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, DE 19801

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
C.A. No. 17-mc-151-LPS

Dear Chief Judge Stark:

CITGO Petroleum Corporation (“CITGO”) and PDV Holding, Inc. (“PDVH”) support the Special Master’s Proposed Order, but make the following request to clarify language in Paragraph 11 of the proposed Order. D.I. 265-1.

CITGO and PDVH are committed to ensuring that, subject to OFAC authorization, the one-third of the Special Master’s compensation contemplated in the proposed order to be paid by the “Venezuela Parties” is paid, but because it is not yet clear which entity will make the payments, CITGO and PDVH request the following revision to the proposed order for clarification and accuracy:

Paragraph in Proposed Order (D.I. 265-1)	Requested Revision
11. <i>Compensation of the Special Master.</i> The Special Master shall be compensated at his usual hourly rate of \$950 per hour and shall also be reimbursed for reasonable travel and other expenses incurred in the performance of his duties. Crystallex, ConocoPhillips, and the Venezuela Parties shall, upon approval by the Court, bear the cost of the Special Master and	11. <i>Compensation of the Special Master.</i> The Special Master shall be compensated at his usual hourly rate of \$950 per hour and shall also be reimbursed for reasonable travel and other expenses incurred in the performance of his duties. Upon approval by the Court, the cost of the Special Master and his Advisors’ compensation shall be borne equally, in one-third shares, by Crystallex, ConocoPhillips,

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his Advisors' compensation equally, with each contributing one-third.	and the Venezuela Parties (one or more of the Venezuela Parties paying, in total, a one-third share). Crystallex, ConocoPhillips, and one or more of the Venezuela Parties shall, upon approval by the Court, bear the cost of the Special Master and his Advisors' compensation equally, with each contributing one-third.
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Respectfully,

/s/ Kenneth J. Nachbar

Kenneth J. Nachbar (#2067)

KJN/saz

cc: All Counsel of Record (Via E-Filing)